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California Regional Water Quality Control Board

Santa Ana Region



 Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

M60050_003958
MCAS EL TORO
SSIC NO. 5090.3.A


March 28, 2007

Base Realignment and Closure
Attn: Mr. Darren Newton
BRAC Environmental Coordinator
7040 Trabuco Road
Irvine, California 92618

COMMENTS ON DRAFT FEASIBILITY STUDY REPORT, INSTALLATION RESTORATION PROGRAM (IRP) SITE 1, EXPLOSIVE ORDNANCE DISPOSAL TRAINING RANGE, FORMER MARINE CORPS AIR STATION, EL TORO, GEOTRACKER NO. DOD100136000

Dear Mr. Newton:

We have reviewed the above referenced document, dated January 2007, which we received on January 31, 2007. We have the following comments:

 The remedial investigations and site assessments have delineated petroleum hydrocarbon releases to surface and near surface soils, underlying groundwater, and surface water at Site 1. The releases are acknowledged in this report. In our review comments on the draft final remedial investigation report, dated September 29, 2006, we requested that you include abatement of these petroleum releases under the on-going petroleum corrective action program. In the response to that comment, the Navy indicated that the petroleum contamination was co-located with Comprehensive Environmental Response, Compensation, and Liability Act of 1980 contaminants and other petroleum hydrocarbon and related contaminants and this contamination would be addressed during the IRP program cleanup at Site 1. Only a single contaminant commonly found in petroleum releases, naphthalene, was evaluated for remedy in this study. No cleanup goal for total petroleum hydrocarbons and no evaluation for remediation for petroleum hydrocarbon releases were evaluated.

We request that the Navy submit a corrective action plan to remediate petroleum releases delineated in soil and groundwater at Site 1 within 90 days. The soil cleanup goal for total petroleum hydrocarbons for this corrective action should be 1,000 milligrams per kilograms.

- Appendix B, Applicable or Relevant and Appropriate Requirements, B2. CHEMICAL-SPECIFIC ARARS, Comprehensive Water Quality Control Plan for Santa Ana Region (Basin Plan), Page B2-5: The Basin Plan also specifies water

California Environmental Protection Agency



received
3/27/07

Mr. Darren Newton


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quality objectives and designated beneficial uses for surface waters including the San Diego Creek and its tributary, Borrego Wash.

For any questions, please call me at (951) 782-4494, or send email to jbroderick@waterboards.ca.gov.

Sincerely,


John Broderick
SILIC/DoD Section

cc via email: Richard Muza, U.S. EPA, Region 9
Quang Than, DTSC, Office of Military Facilities
James Callian, BRAC PMO WEST

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